



STINSON  
MORRISON  
HECKER LLP

Leslie E. O'Hara  
(602) 212-8600  
lohara@stinson.com  
www.stinson.com

1850 N. Central Avenue, Suite 2100  
Phoenix, AZ 85004-4584

Tel (602) 279-1600

Fax (602) 586-5251

August 21, 2009

Judge Roslyn O. Silver  
United States District Court  
Sandra Day O'Connor U.S. Courthouse, Suite 624  
401 W. Washington Street, SPC 59  
Phoenix, AZ 85003-2158

Re: *Watson v. City of Phoenix, et al.*, CV-08-1129-PHX-ROS  
First Notice of Discovery and Settlement

Dear Judge Silver:

The parties unsuccessfully mediated this matter in June, 2008, soon after the Complaint was filed. Since then and before any depositions were taken, the Plaintiffs offered to settle this matter for an amount previously discussed at the mediation. Counsel for Defendants must obtain approval for any settlement from the City of Phoenix through its claims committee process. The presentation to the claims committee will be made after the Plaintiffs' depositions.

Plaintiffs will be deposed on September 21 and 24. Plaintiffs just completed the depositions of the three police officers involved in Doris Watson's incident as well as one of the paramedics that responded to the scene. Defendants have served written discovery requests, the responses to which are due September 11, 2009. Plaintiffs are in the process of promulgating their written discovery requests. No discovery disputes have arisen thus far.

Yours very truly,

STINSON MORRISON HECKER LLP

A handwritten signature in black ink, appearing to read "Leslie E. O'Hara".

Leslie E. O'Hara  
Attorney for Plaintiffs

KANSAS CITY  
OVERLAND PARK  
WICHITA  
WASHINGTON, D.C.  
PHOENIX  
ST. LOUIS  
OMAHA  
JEFFERSON CITY

Judge Roslyn O. Silver  
August 21, 2009  
Page 2

**JONES, SKELTON & HOCHULI PLC**

*Kathleen L. Wieneke*  
Kathleen L. Wieneke  
Attorney for Defendants  
*for and with  
the consent of*

LEO:rvs